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Federal Communications Commission
Office of Secretary



11300 Rockville Pike, Suite 1100
Rockville, Maryland 20852-3030

TO:

CCMI NANP PROPOSAL

REDACTED VERSION

SUBMITTED MAY 2, 1997

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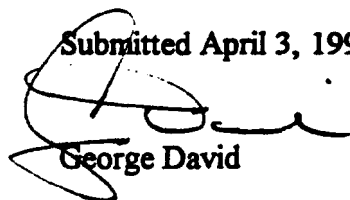
Center for Communications Management Information (CCMI)

A Division of United Communications Group

Proposal for the Administration of the North American Numbering Plan

Contact Information: George David
CCMI
11300 Rockville Pike, Suite 1100
Rockville, MD 20852-3030
301-287-2240 (T)
301-816-8945 (F)

Submitted April 3, 1997



George David

Section 1.0 General Information

1.2 Neutrality

The Center for Communications Management Information (CCMI), is a division of United Communications Group (UCG), a privately held partnership headquartered in Rockville, MD. CCMI is not affiliated with any telecommunications service provider, is fully independent, and provides no telecommunications services.

1.3 Term of Administration

CCMI's proposal is for an initial term of five years, with an option to renew at any time during the initial and subsequent term for up to five additional years. CCMI recognizes the long-term requirements incumbent in the requirements document, and proposes the NANPA, along with NANC, have the ability to exercise the option to renew during the initial and subsequent term in the event substantive, long-term investments, not now foreseen by the Requirements Document, are required by the NANPA.

1.4 Valid Period for Respondents Proposals

CCMI's proposal is valid from May 15, 1997 to May 15, 1998

1.5 Impacts of Regulatory and Industry Activities

1.5.1 Regulatory Impacts

1.5.2 Industry Numbering Committee Changes to Number Resource Assignment Guidelines

CCMI recognizes the dynamic nature of the industry, and the potential for new or changed regulatory and industry directives, procedures and guidelines and will accommodate them subject to NANC approval and appropriate cost recovery adjustments. Likewise, CCMI will, within 10 business days of Industry Numbering Committee (INC) closure, assess the

impact of new or changed INC guidelines and advise, via written notification, NANC and the INC of changes required as a result of INC actions. CCMI's assessment will include a cost analysis and suggested cost recovery adjustments as appropriate. Please note, as well, our proposal regarding Term of Administration (Section 1.3) as it relates to substantive new investments which may be required of the NANPA.

1.6 Performance Review Process

CCMI recognizes the most critical aspect of the NANPA role is providing world class service and information to three main constituent groups. These are:

- 1) telecommunications users, who rely on the NAPA for effective management of number resources to guarantee reliable, predictable and easy to use telecommunications services;
- 2) telecommunications carriers, who fund the NANPA, and who depend on the NANPA for fast, effective and error free administration of number resources critical to them in a competitive, changing market;
- 3) Federal and state regulators charged with the responsibility for making sure reliable, cost effective services are available to users within a framework that provides fair, equitable treatment to all industry participants, carriers and regulators.

To accomplish this, CCMI will:

1. Conduct an annual survey of all participating carriers and obtain their evaluations of NANPA performance in the areas of overall client service and performance in each NANPA area of responsibility (e.g., CO Code Assignment, CIC assignment, etc.).
2. Track and maintain statistics on calls and requests made to the NANPA by category of responsibility.
3. Track and maintain statistics on website accesses, documents searched and retrieved,

and number of website updates.

4. Track and maintain statistics on hard copy documents distributed.
5. Provide a semi-annual report to NANC of all meetings, study groups and standards groups meetings moderated and /or attended by the NANPA.

Having well trained, experienced and motivated staff is the first step toward prompt, effective real-time problem resolution. However, we recognize that often problem resolution requires time. In those instances, CCMI will set a performance objective of 72 hours average time to resolve reported problems, substantially below the ten days in the Requirements Document.

To facilitate problem resolution, CCMI will establish a portion of the NANPA website for problem reporting and create forms and establish procedures for faxing problem reports to NANPA. In the event problems are systemic and exogenous, CCMI will alert NANC and the appropriate industry and regulatory groups, suggest a resolution, and if appropriate, a cost recovery adjustment.

1.8 Preparation and Submission of Proposals

CCMI has met all requirements regarding format, process, delivery and content of the proposal as detailed in the Requirements Document. CCMI also agrees that, in the event of errors in quoted price, time and calculations, the quoted price, time and calculations shall prevail. CCMI also agrees to advise the NANC Chair in writing should CCMI's proposal be withdrawn.

1.9 .1 Evaluation Process

CCMI understands the evaluation process as detailed in the Requirements Document and will comply with Step 4 by responding in writing to questions posed by the NANPA

Working Group and to Step 5 by participating in individual meetings with the NANPA Working Group on May 2, 1997. We suggest the NANPA Working Group indicate, prior to the meeting, particular areas where they have questions or require additional information, so that we may have the appropriate CCMI or UCG personnel available.

1.11 Confidentiality and Use of Information

CCMI has maintained the confidentiality of the Requirements Document. Only those CCMI and UCG personnel involved in preparing our proposal have seen copies.

Similarly, CCMI will not issue any news release or publicity concerning the Requirements Document or the selection of a respondent without the prior written approval of the NANC.

1.12 Inquiries

CCMI has complied by sending all correspondence to the NANC Chair, and we understand that all correspondence, excluding respondent financial information, will be made public.

Section 2.0 Proposal Outline and Respondent Information

Proposal Overview

CCMI's proposal offers the NANC a unique combination of customer focused telecommunications industry experience with a particular emphasis on call rating and routing, coupled with in-depth information publishing experience. This combination results in a cost effective proposal, backed by a financially solid and successful company.

Our proposal meets all or exceeds all the requirements mandated by the NANP Working Group, and suggests an aggressive, flexible approach to consolidating numbering resource management and funding in one organization. CCMI, and its parent company, United Communications Group has an unequaled set a skills in evaluating diverse operations and managing their transition to a new, consolidated operation. These skills will be the critical factors in the early stages of establishing a new NANPA. Once consolidated, CCMI's telecom industry experience will insure dependable, forward looking management and a special emphasis on client, industry and public service.

The management of CCMI and UCG welcomes this opportunity and is excited to participate and contribute to the management, protection and nurturing of a vital industry resource.

Respondent Information

Description of the Respondent's Business

The Center for Communications Management Information (CCMI) is a mullet-media publisher of telecommunications information, and is one of several information publishing

divisions which together comprise United Communications Group (UCG). CCMI has been in business since 1972, and was acquired by UCG from McGraw-Hill in 1990.

CCMI's products and services are marketed to telecommunications end users and vendors, with the vendor market the larger of the two. Our products include:

1. Database and on-line services used in call accounting, network management and design, local and long distance billing and market analysis applications.
2. Copies of original tariff documents filed at the Federal and state level.
3. Summaries and abstracts of tariff documents delivered on CD-ROM and in print media.
4. A series of print newsletters covering telecom management, industry news and CO code changes.
5. Conferences and seminars, including several that addressed Interchangeable NPAs, number portability and uniform dialing.

CCMI products reach several thousand subscribers monthly, and through value added software vendors, several thousands more. Our information is used daily in critical billing and call routing applications that have at their core the North American Numbering Plan (NANP).

UCG's other divisions are similar to CCMI. They publish leading business-to-business information services in the fields of healthcare, mortgage banking, petroleum pricing, government procurement, software design, postal system information, and taxation.

UCG will celebrate its twentieth anniversary this September, and enjoys a reputation in the information publishing industry of sustained excellence. UCG has achieved consistent

double digit growth in revenue and profit, and is one of the largest privately held companies in the Greater Washington D.C. area.

CCMI will not use any subcontractors.

Respondent Financial Information

CCMI is a division of UCG, a privately held partnership. We do not file or publish financial reports. However, we understand the NANC's responsibility to make certain the new NANPA is financially sound and has the resources to satisfy all the responsibilities detailed in the Requirements Document. To address these concerns, we've outlined below several financial measures that attest to the financial strength of CCMI and UCG.

1. UCG has been in business for nineteen years, and is now one of the largest privately held companies in the Washington D.C. metro area. CCMI has been in business for twenty-five years, and has been an integral part of UCG since 1990.
2. UCG has enjoyed double digit growth in revenue and profits every year since its founding. The CCMI division represents 10% of UCG's total revenue and 15% of UCG's total profits.
3. Signet is our primary bank. You may contact Bryan Mitchell, Senior Vice-President, for a reference.
4. One of the General Partners, along with UCG's Chief Financial Officer, will be available at the May 2, 1997 meeting with the NANPA Working Group to address any specific questions the NANPA Working Group may have regarding financial resources.

Additional Information

With respect to item 1 of the Neutrality Criteria, CCMI and UCG are not affiliated with any telecommunications service provider. UCG is privately held with no ownership by a

telecommunications service provider.

Regarding item 2, CCMI markets its information services to telecommunications users, equipment vendors, manufacturers and carriers. Of CCMI's total annual revenues, thirty percent (30%), is derived from telecommunications carriers, with no more than two percent (2%) from any single telecommunications carrier.

Lastly, CCMI is not subject to any undue influence by a party with a material interest in the outcome of numbering administration and activities.

List of Company Officers

CCMI is a division of UCG, which is a partnership. The partners, all of whom are involved daily in the management of UCG and its divisions, are:

Bruce Levenson - General Partner

Edwin Peskowitz - General Partner

Robert Koran - General Partner and Director of Information Technology

Nancy Becker - General Partner and Director of UCG's mortgage banking division,
ECHO, and UCG's government information division, The
National Institute of Federal Procurement.

Daniel Brown - General Partner and Director of UCG's Healthcare Information
Division

Performance Bond

Neither CCMI nor UCG has been required to provide a performance bond in the past. We will provide evidence that we are bondable under separate cover through our insurance carrier.

Legal Proceedings

Neither CCMI nor UCG are involved in any legal proceedings which could materially affect the company's financial position, or ability to perform its duties as NANPA.

References

1. EDS

Contact: Mr. D. Foerster

EDS

Account Manager

10975 Benson Drive

Overland Park, KS 66210
913-339-4818

CCMI provides database services to EDS clients who use EDS' IX-Plus billing and accounting package. EDS has been a CCMI client for six years.

2. Stonehouse & Co.

Contact: Mr. Marshall Roberts

President

4100 Spring Valley Road

Dallas, TX 75244

214-960-1566

Stonehouse & Co. markets the MONIES telemanagement system for billing and cost accounting of telecommunications services. The MONIES system contains the CCMI database, and is used by Fortune 500 companies, state governments and major colleges and universities. Stonehouse & Co. has been a CCMI client for

thirteen years.

3. Systems Design and Development

Contact: Mr. Ronald Grau

Systems Design & Development

1515 North Federal Highway, Suite 212

Boca Raton, FL 33432

407-367-1648

Systems Design and Development (SDD) uses the CCMI database in the hospitality industry as part of a Hotel Management and Accounting system. SDD has been a CCMI client for 8 years.

Proposal Details

A summary of CCMI's proposal is provided in Section 2.0. Detailed responses to the Requirements Document are provided in the tabbed Sections 3.0 - 10.0 following. The completed Compliance Matrix follows in this section.

Section 2.1 Respondent Confidential Information

Per the March 26, 1997 NANPA Working Group meeting, a redacted version of the proposal will be submitted at the May 2, 1997 meeting with the NANPA Working Group Evaluation Team.

**ATTACHMENT 4
COMPLIANCE MATRIX**

SECTION 1.0 - General Information	REQUIREMENT (see Note 1)	PROPOSAL
1.1 Introduction	Information on ability and flexibility to expand the scope of responsibilities from NANPA to include CO Administration	
1.2 Neutrality	<ol style="list-style-type: none"> 1. Non-government 2. Independent third party <ul style="list-style-type: none"> • not a telecommunications service provider • not owned or affiliated 3. Disclosure of any affiliations or associations with telecom 	<ol style="list-style-type: none"> 1. CCMI is a division of United Communications Group, a privately held partnership. 2. CCMI is fully independent, provides no telecommunications services and is not affiliated with any telecommunications service provider. 3. Not applicable
1.3 Term of Administration	5 years (may be renewed)	CCMI agrees to an initial term of five (5) years with an option to renew at any time during the initial or subsequent term for up to five (5) additional years. The renewal option may be exercised by either the NANPA or the appropriate regulatory authorities.
1.4 Valid Period for Respondent Proposals	Valid for a period of 12 months	CCMI's proposal is valid from May 15, 1997 to May 15, 1998
1.5 Impacts of Regulatory Activities and Industry	Accommodates changes due to new industry or regulatory directives, procedures or guidelines	CCMI agrees to evaluate and accommodate, subject to NANC approval and adjusted cost recovery as necessary, any new directives, procedures or guidelines.
1.6 Performance Review Process	1. Develop and describe internal documented performance monitoring mechanism and make available to the industry through NANC	1. CCMI will monitor and evaluate performance through a) annual surveys of all participating tele-communications carriers and regulators b) for each NANPA responsibility, track and maintain statistics on all calls and request for information c) track and maintain statistics on all website access and document

	<p>2. Investigate and report on identified problems within 10 business days</p> <p>3. Take corrective action</p>	<p>requests d) track and maintain statistics on hard copy documents distributed e) semi-annual report to NANC and other industry groups, of all NPA relief meetings, study groups, standards organization, and other industry fora moderated/attended by the NANPA.</p> <p>2. CCMI will set an objective of 72 hours average time to resolve reported problems.</p> <p>3. CCMI will establish procedures for problem reporting via the NANP website and fax.</p>
1.8 Preparation and Submission of Proposals	<p>1. Responsible for preparation costs</p> <p>2. Addressed all requirements</p> <p>3. Proposal in proper format</p> <p>4. Signed by a duly authorized representative</p> <p>5. Marked "Proposal-NANPA," identifies name of the respondent organization</p> <p>6. Received by NANC by 12:00 Noon ET on April 3, 1997</p> <p>7. One paper copy and diskette marked "Master Copy" to NANC</p> <p>8. No facsimile</p> <p>9. English</p> <p>10. Forty paper copies in binders and two diskettes in IBM PC, Microsoft Windows, Microsoft Word 6.0/Excel 4.0</p> <p>11. Times New Roman font size 12, printed on one side, double-spaced, 8-1/2x11 3-hole punched paper.</p> <p>12. Each section of proposal begins on new page and is tabbed separately</p> <p>13. Provide additional copies as requested by the FCC</p>	<p>1. CCMI agrees.</p> <p>2. CCMI has addressed all requirements, and noted any deviations or exceptions.</p> <p>3. CCMI is in the format detailed by the Requirements Document</p> <p>4. CCMI's proposal is signed by George David, Director-CCMI, a division of United Communications Group.</p> <p>5. CCMI complies</p> <p>6. CCMI's proposal was delivered to NANC April 3, 1997.</p> <p>7. CCMI complies</p> <p>8. CCMI complies</p> <p>9. CCMI complies</p> <p>10. CCMI complies</p> <p>11. CCMI complies</p> <p>12. CCMI complies</p> <p>13. CCMI will comply when requested</p> <p>14. CCMI will comply if requested.</p> <p>15. CCMI complies</p>

	<p>14. Advise NANC Chair in writing if proposal should no longer be considered</p> <p>15. In event of respondent error in quoted price, time or calculations, the quoted price, time and calculations shall prevail</p>	
1.91 Evaluation Process	<p>1. Respond to questions concerning proposal in writing</p> <p>2. Participate in individual meeting with evaluators</p>	<p>1. CCMI complies.</p> <p>2. CCMI complies.</p>

SECTION 2.0 - Proposal Outline and Respondent Information	REQUIREMENT	PROPOSAL
2.0 Proposal Outline and Respondent Information	<p>Cover Page - Includes contact name, address, phone number, fax number, date, and signature of authorized representative</p> <p>Proposal Overview</p> <ol style="list-style-type: none"> Summary of key features and deviations and exceptions Use of subcontractors Certification that respondent and any subcontractor comply with the provisions of the Requirements Document in its submission Identify willingness to accept a recommendation that will assign to them the administration of either Part 1 or Part 2 <p>Respondent Information Description of Respondent's Business</p>	<p>Contact: George David Address: Suite 1100 11300 Rockville Pike Rockville, MD 20852-3030 (T) 301-287-2240 (F) 301-816-8950</p> <ol style="list-style-type: none"> CCMI's proposal offers the NANC the combination of in-depth knowledge of the telecommunications industry, coupled with extensive experience in information publishing. This combination backed by a financially solid, professionally managed company result in a cost effective solution for the industry. Our proposal meets the key requirements set out by the NANP Working Group, proposes minor modifications in the Billing & Collection process, and is a offered as a complete solution to the NANC. CCMI's proposal excludes the use of contractors. Not applicable CCMI's proposal is for total administration (NANPA and CO Code Ad-ministration); CCMI will administer Part 2 (Billing and Collection) only if Part 1 is also recommended. <p>CCMI is a multi-media publishing</p>

		<p>company providing telecommunications information to telecommunications vendors and users. CCMI's products range from copies of tariff documents filed at the state and Federal level, to rate and tariff abstracts, newsletters, on-line services and rating databases. CCMI's data is used daily by end-users, value added resellers and equipment manufacturers in billing and call routing applications. CCMI was founded in 1972 and has been a division of United Communications Group since 1990.</p>
	Respondent Financial Information	<p>CCMI is a division of United Communications Group, a privately held partnership. As such, UCG does not publish or file financial reports; UCG's Chief Financial Officer as well as one of UCG's partners will be available at the NANPA Working Group meeting on May 2, 1997 to answer any specific questions regarding UCG's and CCMI's financial condition. The proposal contains several factors regarding our finances, along with a bank reference, which we believe attests to our ability to perform the NANPA responsibility.</p>
	Additional Information	<p>CCMI fully complies with the Neutrality Criteria specified in the Requirements Document.</p>
	List of Company Officers	<p>Bruce Levensen - General Partner and Director of Electronic Information Services Edwin Peskowitz- General Partner and Director of Editorial Services Robert Koran - Partner and Chief Information Officer</p>

	<p>Performance Bond</p> <p>Legal Proceedings</p> <p>References</p> <p>Proposal Details</p> <p>Compliance Matrix</p>	<p>Director of Electronic Information Services Edwin Peskowitz- General Partner and Director of Editorial Services Robert Koran - Partner and Chief Information Officer Daniel Brown - Partner and Director of Healthcare Information Division Nancy Becker - Partner and Director of Mortgage Banking Division</p> <p>CCMI and UCG have not had a previous requirement to be bonded. Evidence of being bondable will be submitted under separate cover via our insurance carrier.</p> <p>Neither CCMI nor UCG is involved in any legal proceedings which could materially affect the company's financial position, or ability to perform its duties as NANPA.</p> <p>Mr. D. Foster -EDS Mr. M. Roberts - Stonehouse & Co. Mr. R. Grau - Systems Design & Development</p> <p>Not applicable</p> <p>CCMI complies</p>
2.1 Respondent Confidential Information	Recommended respondent submits proposal with confidential information deleted	Per March 26, 1997 NANPA Working Group meeting, the redacted version of the proposal will be submitted May 2, 1997

	<p>Performance Bond</p> <p>Legal Proceedings</p> <p>References</p> <p>Proposal Details</p> <p>Compliance Matrix</p>	<p>Daniel Brown - Partner and Director of Healthcare Information Division Nancy Becker - Partner and Director of Mortgage Banking Division</p> <p>CCMI and UCG have not had a previous requirement to be bonded. Evidence of being bondable will be submitted under separate cover via our insurance carrier.</p> <p>Neither CCMI nor UCG is involved in any legal proceedings which could materially affect the company's financial position, or ability to perform its duties as NANPA.</p> <p>Mr. D. Foster -EDS Mr. M. Roberts - Stonehouse & Co. Mr. R. Grau - Systems Design & Development</p> <p>Not applicable</p> <p>CCMI complies</p>
2.1 Respondent Confidential Information	Recommended respondent submits proposal with confidential information deleted	Per March 26, 1997 NANPA Working Group meeting, the redacted version of the proposal will be submitted May 2, 1997

SECTION 3.0 - NANPA Qualities and Attributes	REQUIREMENT	PROPOSAL
3.0 NANPA Qualities and Attributes	<p>1. Knowledge about telecommunication network operations (routing, rating, billing), determine legitimacy of applications, assignments to appropriate service providers</p> <p>2. Information resource capability</p> <p>3. Capability to develop, operate, and maintain hardware, software, and mechanized systems</p>	<p>1. CCMI's products are used by telecommunications users, vendors and value added software suppliers for telecommunications call routing, rating and billing. Our information is derived from telecommunications tariffs as well as standard industry sources. Developing and supporting these products requires in depth knowledge of numbering assignment and call routing procedures and practices in the industry.</p> <p>2. CCMI clients rely on our staff to understand numbering issues and procedures and to reflect them accurately and consistently in our products. We are organized to do this and to explain numbering issues to our clients; the NANPA responsibilities would mirror, to a large extent, much of the activity CCMI already performs for clients.</p> <p>3. More than 75% of CCMI's revenues are derived from products and services maintained and delivered via computerized systems. Similarly, over 50% of UCG's revenues are derived from electronic products. We've developed staff, within CCMI, and with UCG that has the expertise to manage these systems, and as importantly, our experience with acquisitions has given us significant experience in evaluating, improving and integrating the systems of other companies. These skills will be invaluable in implementing the NANP</p>

	<p>4. Management skills - organization, resource management, staffing, budgeting</p> <p>5. Project management skills</p> <p>6. Interpersonal and negotiation skills</p> <p>7. Management of proprietary and</p>	<p>and CO Code Transition plans.</p> <p>4. CCMI has stable, experienced long-term managers, complimented by similar characteristics within UCG's management staff. Because of that, we can point to two critical measures of management skill, profitability and customer retention. CCMI and UCG have been consistently profitable since founding, and our renewal rates (the most critical measure of customer satisfaction for an information publisher) exceed industry standards by a wide margin.</p> <p>5. /6. The information sources we use to develop and support our products, and the processes we use to reflect that information in specialized products, requires each of these skills. Our products depend of a reliable, consistent flow of tariff data from carriers. These negotiated, long-term contractual relationships with carriers and regulators are built on CCMI's interpersonal and negotiating skills. Likewise, since our products must accurately reflect carrier services (in a market that changes almost daily), we must constantly be modifying our products in a manner the obviates or minimizes any impact on our clients. To accomplish this, we must develop and communicate projects schedules to our clients, and then deliver on time. Our quarterly product enhancement process is an excellent example of deploying project management skills to meet customer needs.</p>
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	<p>competitively sensitive data</p> <p>8. Public relations skills 9. Legal counsel and telecommunication law competency</p>	<p>7. Many CCMI's clients compete with each other and CCMI staff has access to each client's proprietary customer lists. Additionally, many clients work with CCMI to develop proprietary data feeds (which include proprietary rate data). CCMI staff understands the critical need to protect confidential information and is well trained in this area.</p> <p>8. As publishers, CCMI primary task is to explain complex information in a straightforward, easy-to-understand manner, and we recognize the critical need for these skill regarding numbering. Performing this role will be a logical extension of much of the publishing activity CCMI performs daily.</p> <p>9. CCMI has access to UCG's legal counsel, and where required will retain additional counsel, specializing in telecommunications, as required to satisfy the responsibilities of NANPA.</p>
3.1 Personal Resumes of Respondent's Personnel and Sub-contractors	<p>1. Identify personnel</p> <p>2. Provide employee resumes</p>	<p>1. George David - Director -CCMI Robert Koran - Chief Information Officer - UCG Mitchell Barlow - Director - Information Systems -UCG Edward Sullivan - Manager of Tariff Analysis - CCMI Michael Cocchiarra - Manager of Technical Services - CCMI Todd Foreman - Chief Financial Officer -UCG</p> <p>2. Employee resumes provided in proposal.</p>

SECTION 4.0 - NANPA Administration Functional Requirements	REQUIREMENT	PROPOSAL
4.1 General Responsibilities	1. Assign and administer in an efficient, effective, unbiased, and non-discriminatory manner 2. Advise industry on numbering issues to support current and future needs	CCMI will comply
4.1.1	Maintain relationship with governmental and regulatory bodies, address policy directives	CCMI will comply
4.1.2	Participate in numbering standards and industry fora	CCMI will comply
4.1.3	Represent NANP at national and global numbering bodies	CCMI will comply
4.1.4	Attend SGA and SG2 ITU	CCMI will comply
4.1.5	Review requests for all numbering resources, refer to appropriate industry forum and participate in recommendation	CCMI will comply
4.1.6	Maintain necessary administrative staff - legal, financial, technical, equipment, facilities, billing	CCMI will comply
4.1.7	Recognize new issues not yet addressed by industry and refer to proper forum	CCMI will comply
4.1.8	Respond to information requests from industry and regulators	CCMI will comply
4.1.9	Provide numbering information to requesters via web, electronic or paper based on requesters accessibility	CCMI will comply
4.1.10	Provide assistance to used to optimize number resource utilization	CCMI will comply
4.1.11	Coordinate number resource activities with NANP member counties' administrators	CCMI will comply
4.1.12	Determine final allocation methodology for sharing costs between NANP countries	CCMI will comply

4.2 NANP Number Resource Assignment & Administration		With respect to items 4.2.1 through 4.2.12, CCMI will comply. Additionally, our intent is to consolidate the several different systems and tools into one single system as soon as possible (ideally during the 90 day NANP transition period)
4.2.1 Numbering Plan Area (NPA) Codes	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items 	See 4.2 above
4.2.2 NPA 809 Central Office Codes	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items 	See 4.2 above
4.2.3 International Inbound NPA 456 NXX Codes	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items 	See 4.2 above
4.2.4 PCS N00 (NPA 500) NXX Codes	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items 	See 4.2 above
4.2.5 900 NXX Codes	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items 	See 4.2 above
4.2.6 N11 Service Codes	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items 	See 4.2 above
4.2.7 800 855-XXXX Line Numbers	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items 	See 4.2 above
4.2.8 555-XXXX Line Numbers	<ol style="list-style-type: none"> 1. How, controls and work volume 2. Tools 	See 4.2 above

	3. Reporting 4. Miscellaneous items	
4.2.9 Carrier Identification Codes(CICs)	1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items	See 4.2 above
4.2.10 Vertical Service Codes (VSCs)	1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items	See 4.2 above
4.2.11 Automatic Number Identification	1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items	See 4.2 above
4.2.12 Non-Dialable Toll Points (NPA 886 and 889)	1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items	See 4.2 above
4.2.13 Additional NANPA Functional Requirements	1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items	CCMI will accommodate changes to existing numbering guidelines as well as new numbering guideline for numbering resources. Where appropriate, CCMI will recommend adjusted cost recovery mechanisms to the NANC.
4.3 NANP Transition Plan	1. How, controls and work volume 2. Tools 3. Reporting 4. Miscellaneous items	We plan to support NANP activities from our Rockville, Md. office and would seek to accelerate the transition period consistent with providing ongoing client services. We plan on a structure and staff that mirrors that of the present NANP. NANP functions will reside within the CCMI Division.